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11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE DISTRICT OF ARIZONA

13 United States of America,
14 Plaintiff,
15 vs.
16 Samuel Rappylee Bateman,
17 Defendant.

18 No. CR-22-08092-001-PCT-SMB

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20 **UNITED STATES' SENTENCING
MEMORANDUM**

21 **I. Introduction**

22 The defendant, Samuel Rappylee Bateman, was the leader of an interstate child
23 sexual abuse ring that spanned numerous states and victimized at least ten underage girls.
24 As the new self-proclaimed prophet of the FLDS, the defendant amassed over 20 "wives,"
25 including 10 child "brides" as young as 9 years of age. Through coercion and
26 manipulation, he forced his child "brides" to participate with him in group sexual activities
27 along with other adult men and women. He personally raped the victims in group settings
28 and individually on a daily basis and for years. He also tried to force his victims to engage
in sexual activity with each other and his adult "wives." Once he amassed a following, the

1 defendant isolated his victims from the outside world. During one of the many “sacred
2 ordinances” the defendant organized, he allowed other men to rape his “wives” and one of
3 his 13-year-old child “brides” while he watched and raped another young girl.

4 When the investigation into the child sex abuse ring began in 2022, the defendant
5 started hiding evidence and attempted to tamper with witnesses. He encouraged his
6 followers to do so as well, and they did.

7 The defendant was first charged and arrested federally in September 2022 with
8 obstruction of justice charges. In May 2023, he faced charges for his conduct related to
9 the child sex abuse ring. In the Third Superseding Indictment, the defendant was charged
10 with 53 counts related to child sex trafficking and conspiracy, as well as kidnapping and
11 obstruction of justice.

12 On April 1, 2024, the defendant pled guilty to Conspiracy to Commit Transportation
13 of a Minor for Criminal Sexual Activity and Conspiracy to Commit Kidnapping. The plea
14 agreement contained a detailed factual basis that was 15 pages long. For his acceptance of
15 responsibility and sparing the victims from having to testify at a trial against him, the
16 United States agreed to a sentencing range of 20 to 50 years’ imprisonment followed by
17 lifetime supervised release. The only appropriate sentence here under the plea is 50 years’
18 imprisonment.

19 The facts are set forth in detail not only in the plea agreement, but also in the Third
20 Superseding Indictment, as well as the presentence report. Also, this Court sat through the
21 month-long trial of two of the co-defendants in this case—the Bistline brothers. This Court
22 heard the testimony of each of the victims, as well as other witnesses who were impacted
23 by the defendant’s crimes. The defendant’s crimes, along with those of a few key co-
24 defendants in this case, impacted an entire community and tore numerous families apart.
25 The defendant caused extreme physical and mental anguish to so many, particularly the 9
26 named victims. For that, a 50-year prison sentence is not only warranted, but necessary.

1 **II. Background**

2 As this Court is aware from testimony in the Bistline trial, when FLDS prophet
3 Warren Jeffs was imprisoned for sexually abusing children in 2012, he issued an edict to
4 the FLDS community voiding existing marriages, precluding sexual activity, and
5 prohibiting new marriages until his release from imprisonment. In the FLDS belief system,
6 only the prophet can ordain marriages. Therefore, the defendant and his co-defendant
7 LaDell Bistline, Jr., along with separately indicted co-conspirator, Moroni Johnson,
8 capitalized on this leadership void and installed the defendant as the new “prophet” so they
9 could get what they wanted—new wives, sexual activity, and more children.

10 In order to justify what they were doing, which included trading the women and
11 girls under their control like property, these men began to preach ideas inconsistent with
12 FLDS teachings, including the idea of self-revelation, meaning that one could ask God
13 directly what to do rather than receiving God’s will through the prophet. Because their
14 teachings were initially met with resistance, they tried to convince their followers that the
15 defendant was a prophet.

16 These men were not victims of the FLDS teachings. They created their own
17 ideology to serve their selfish interests, and they elevated the defendant as their new leader
18 to accomplish their goals. The defendant and Johnson traveled to Canada in February 2019
19 to spread their teachings, at which time the defendant attempted to marry his own 13-year-
20 old daughter, and told her he wanted to have a baby with her. Fortunately, the defendant’s
21 then wife immediately divorced the defendant, obtained a restraining order against him,
22 and protected her daughter—something many of the co-defendants and co-conspirators did
23 not do in this case.

24 The men were shunned by the FLDS community in Short Creek, Arizona, and they
25 relocated their operation to Lincoln, Nebraska. Johnson and Bistline, Jr. gave their own
26 underage daughters to the defendant as child “brides,” knowing full well that Bateman
27 would sexually abuse the girls. Johnson gave five of his underage daughters, as well as his
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1 step-daughter, to the defendant. They were 9, 10, 12, 13, 14 and 17 years old. Bistline, Jr.
2 gave his two youngest daughters to the defendant. They were 9 and 10 years old. Johnson
3 and Bistline, Jr. also began recruiting additional followers for the defendant, including their
4 wives, family members, and caretakers.

5 The defendant, Johnson, and Bistline, Jr. all participated in group sexual activity
6 with several of the young victims on multiple occasions. When law enforcement and the
7 Department of Child Safety (DCS) became suspicious, Bistline, Jr. lied for the defendant,
8 and in return, was loaned many of the defendant's child "brides" for a couple of hours. He
9 was eventually rewarded with a new young "wife." After acquiring the majority of his
10 child "brides" in Lincoln, Nebraska in 2020, the defendant and his followers all moved
11 back to the Short Creek area in the beginning of 2021. Initially, they all lived together
12 under one roof where the defendant was openly sexually abusing the victims. After the
13 defendant was given the last of his child "brides"—Jane Does 10 and 11—he moved into
14 a very small home with all his "wives" and child "brides" and had his followers continue
15 to support him, financially and otherwise.

16 The defendant continued to sexually abuse his child "brides" on a daily basis while
17 his co-defendants stood by and allowed it, even participated in it. The young victims were
18 made to sleep naked every night, whether it was in bed with the defendant or on the floor
19 around his bed. He would choose a couple of girls to sleep with him each night, which
20 meant they had to have sex with him. He engaged in sex with the girls in front of one
21 another and would encourage them to touch each other while he was having sex with them.
22 The defendant also allowed three men to join in the "Atonement" with him: Johnson,
23 Bistline, Jr., and co-defendant Torrance Bistline, who anally raped 13-year-old Jane Doe 7
24 while the defendant and others watched.

25 Although Torrance Bistline came into the picture later than the other men, he also
26 promoted the defendant as a prophet. He funded the defendant and his "wives" and child
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1 “brides.” He paid the defendant an exorbitant amount of money for doing nothing, and he
2 bought the defendant luxury vehicles to enhance the defendant’s status in the community.
3

4 The defendant treated his child “brides” like chattel and controlled every aspect of
5 their lives. He traded them with other men: he literally gave them away and took them
6 back as he pleased. He paraded them around town on a flatbed trailer. He would have
7 them sing to him every night, prepare his meals and drinks, and draw his bath for him. He
8 required them to “confess” minor infractions and belittled them in front of his followers.
9 He would transport them to various locations in camp trailers and sexually abuse them. He
10 would take them to the mountains and teach them how to hide from law enforcement and
what to say if ever questioned.

11 Within a two-week period, the defendant was pulled over by law enforcement twice
12 for putting the young victims in extremely dangerous situations. On August 14, 2022, he
13 was driving his truck on the highway pulling a trailer with three of the young victims sitting
14 unsecured on a side-by-side atop the trailer. Exactly two weeks later, on August 28, 2022,
15 the defendant was driving on the highway in Flagstaff, pulling a box trailer, where those
16 same three young victims were sitting completely unsecured, with a make-shift toilet, no
17 air-conditioning, and a door that was not latched. He was more concerned that he would
18 be pulled over and caught with the girls than he was about their safety.

19 After the defendant was arrested for child endangerment, the defendant immediately
20 called co-defendant Torrance Bistline and his other followers from jail and told them to
21 delete his Signal account, and to tell others to do the same. This formed the basis of the
22 defendant’s first federal Indictment. He was arrested on September 13, 2022, on the same
23 day the FBI executed search warrants in Colorado City. The victims were taken into DCS
24 custody the next day. At the time, the defendant and his followers had convinced the girls
25 they should not talk about what was happening.

26 A couple of months later, in November 2022, the defendant and many of his co-
27 defendants devised a plan to kidnap the girls from DCS custody. They were successful in
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1 taking all but one of the victims from custody and transporting them out of state. Co-
2 defendant Moretta Johnson was arrested with the eight victims in Spokane, Washington a
3 few days later. The defendant continued to attempt to obstruct justice from custody, and
4 many of his co-defendants did the same. To this day, some of his co-defendants and
5 unindicted co-conspirators support the defendant.

6 **III. Sentencing Factors**

7 Fortunately, each and every one of the victims in this case is free from Bateman's
8 control and abuse. Some of the co-defendants have denounced the defendant and
9 cooperated with the investigation, and many of them testified at the trial against the Bistline
10 brothers. This Court heard first-hand the absolute devastation the defendant's actions, as
11 well as those of his co-defendants, caused for so many. Jane Doe 10, who was 14 when
12 she was given to the defendant, wrote a victim impact statement explaining how the
13 defendant harmed every part of her life: he stripped her of her identity—including her
14 personality, dreams, and ambitions—and she lost her education, self-confidence, and many
15 of her family relationships. These young victims will live with the memories and the
16 trauma they suffered at the hands of the defendant and some of his co-defendants for the
17 rest of their lives.

18 The nature of the offenses could not be more serious. The impact on the victims
19 could not be more tragic. The history and characteristics of the defendant do not change
20 this conclusion. The defendant and some of his co-defendants knew what they were doing
21 was wrong. The defendant has acknowledged that he knew what he was doing was illegal.
22 Contrary to what has been said, the defendant's conduct was not consistent with the
23 teachings of the FLDS. The vast majority of the FLDS community rejected what the
24 defendant and his co-defendants were doing. They did it anyway. The defendant cannot
25 now use his proclaimed religious beliefs as an excuse, or even in mitigation.

26 The defendant was only given the opportunity to plead to something less than the
27 Guidelines-recommended life sentence in exchange for his accepting responsibility and
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saving the victims from having to testify in a trial against him about the horrific things he did to them. Unfortunately, they still had to endure that experience, but that was out of the defendant's hands. A 50-year sentence is sufficient, but not greater than necessary, to accomplish the goals of federal sentencing and to satisfy the Title 18, United States Code, Section 3553(a) factors. A 50-year sentence gives the defendant hope of a short life outside of prison, but protects the public from the potential of future crimes by the defendant. The need for deterrence is also critical in the defendant's and co-defendants' community as the defendant still has some dedicated followers to this day. A 50-year sentence, which is essentially a life sentence for the 48-year-old defendant, provides just punishment in light of all of the circumstances.

IV. Conclusion

For these reasons, the United States asks this Court to accept the plea agreement and sentence the defendant to 50 years' imprisonment followed by lifetime supervised release, to allow the victims to put this tragic chapter behind them and continue to heal.

Respectfully submitted this 4th day of December, 2024.

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s/ Dimitra H. Sampson
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CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2024, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing a copy to the following registrants:

Brian Russo

Attorney for Defendant (1) Samuel Rappylee Bateman

s/ Stephanie Ludwig
U.S. Attorney's Office